

To: R5WebSupport[R5WebSupport@epa.gov]
Cc: Morgan, Andrea[Morgan.Andrea@epa.gov]
From: Ogulei, David
Sent: Thur 4/24/2014 7:17:51 PM
Subject: RE: Changes to Veolia Permit Modification Webpage

Thanks for your help with this. That document opens now; however, there are still a few changes that need to be made. Could you make the changes highlighted below? This is what the page looks like right now from our end:

The screenshot shows the EPA Region 5 Air and Radiation website. The header includes the EPA logo, navigation links (Home, About, Contact, etc.), and a search bar. The main content area is titled "Veolia ES Technical Solutions LLC. Air Permitting Actions Sauget, Ill." and "Air Permit Renewal". It contains a paragraph about the permit renewal process and a list of "Permit Renewal Documents" with links to various appendices and notices. A sidebar on the right contains "Site Information" with a map of the location and "Contact Information" for the Air Division.

Region 5 Air and Radiation
 Serving Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin and 25 Tribes

Veolia ES Technical Solutions LLC. Air Permitting Actions Sauget, Ill.

Air Permit Renewal

Veolia ES Technical Solutions LLC (Veolia) has submitted to the U.S. Environmental Protection Agency an application to renew its Clean Air Act Title V operating permit. Veolia, which is located at 7 Mobile Avenue in Sauget, Illinois, stores and burns hazardous waste. EPA deemed Veolia's application complete on September 11, 2013. EPA is currently reviewing the application and plans to propose its decision on the application within the next several months. This website will be updated when EPA makes its decision available for public comment.

Permit Renewal Documents

- * Application for Renewal of Major Source Operating XX (PDF) (114 pp., 2.7 MB) April 2013
- * Addendum to Application for Renewal of Major Source Operating XX (PDF) (88 pp., 3.8 MB) Aug 2013
- * Email Clarifications Addendum (PDF) (3 pp., 48 KB) Nov 2013
- * Certification for revisions to Title V Application for Renewal, August 2013 Addendum (PDF) (17 pp., 8 MB) April 2014
- * Email Change in VSM Calculation Methodology for Material Processing Areas (PDF) (3 pp., 24 KB) April 2014
- * Title V Renewal Completeness Determination (PDF) (2 pp., 48 KB) Sep 2013
- * Terms Appendix A (PDF) (179 pp., 2.3 MB) Oct 2013
- * Nonapplicable Regulations Appendix B (PDF) (14 pp., 812 KB) Sep 2013
- * SPS Emissions (PDF) (1 pp., 44 KB) Dec 2010
- * Most Recent Notification of Compliance (NOC) Appendix E (PDF) (219 pp., 6.4 MB) Oct 2008
- * Startup, Shutdown, and Malfunction Plan Appendix G (PDF) (63 pp., 1.2 MB) Oct 2008
- * Title V Items to be Removed Appendix K (PDF) (15 pp., 44 KB) Oct 2008
- * Feedstream Analysis Plan Appendix J (PDF) (14 pp., 229 KB) Oct 2008
- * Emergency Safety Valve Operations Plan Appendix I (PDF) (17 pp., 229 KB) Oct 2008
- * Automatic Weed Feed Cutoff Plan Appendix H (PDF) (16 pp., 268 KB) Oct 2008
- * Continuous Emissions Monitoring System Quality Assurance Plan Appendix D (PDF) (60 pp., 1.2 MB) Oct 2008
- * Construction Permit Appendix F (PDF) (27 pp., 1.1 MB) Feb 2001
- * Waste Analysis Plan for Trade Waste Incineration (PDF) (102 pp., 3.8 MB) Sept 1994
- * Addendum to Veolia Renewal Application Appendix C Figures

Site Information

Map showing the location of Veolia ES Technical Solutions in Sauget, IL (St. Clair County).

Contact Information

Air Division
 Andrea Morgan
 (morgan.andrea@epa.gov)
 312-353-6052

Links

Operating Permits (Title V)

Comprehensive Performance Tests Reports

- * [Notification of Compliance \(PDF\)](#) (49 pp, 1.2 MB) Jan 2014
- * [Comprehensive Performance Test Report \(PDF\)](#) (128 pp, 3 MB) Jan 2014
- * [Appendix I Sampling Equipment/Instrumentation Calibration Documentation \(PDF\)](#) (34 pp, 3.8 MB) Jan 2014
- * [Appendix H Data Quality Assessments \(PDF\)](#) (77 pp, 1.1 MB) Jan 2014
- * [Appendix B Spillage Report \(PDF\)](#) (160 pp, 13.7 MB) Jan 2014
- * [Appendix C Process Operational Data \(PDF\)](#) (445 pp, 2.3 MB) Oct 2013
- * [Appendix G Analytical Data Reports \(PDF\)](#) (14,650 pp, 329.6 MB) Oct 2013 Due to its size, this PDF will be available directly from [Andrea Morgan](#) and not available for download from this web site.
- * [Appendix F Sampling Documentation \(PDF\)](#) (1,619 pp, 22.3 MB) Oct 2013
- * [Appendix E Chain-of-Custody/Field Logbook \(PDF\)](#) (442 pp, 40.3 MB) Oct 2013 Due to its size, this PDF will be available directly from [Andrea Morgan](#) and not available for download from this web site.
- * [Appendix D Continuous Monitoring System Performance Evaluation Test Report \(PDF\)](#) (100 pp, 4.8 MB) Oct 2013
- * [Appendix A CEMS DATA report \(PDF\)](#) (440 pp, 4.8 MB) Sept 2013

Proposed January 2013 Air Permit Reopening

EPA proposes to reopen a Clean Air Act permit for a hazardous waste combusting facility in southern Illinois. U.S. EPA is undertaking this permit action for Veolia ES Technical Solutions LLC, 7 Mobile Ave., Sauget, IL, near St. Louis, to modify its Clean Air Act Title V operating permit. The revised permit would include "feedrate" limits for certain heavy metals. Feedrate limits are the maximum amount of heavy metals Veolia can feed into the incinerator combustion unit per hour. The heavy metals include mercury, arsenic and lead. The permit also would include additional requirements for monitoring the waste incinerated by Veolia at the facility.

U.S. EPA has based the proposed feedrate limits, which comply with applicable regulations, on available performance test data. Veolia will continue operating the combustors following the requirements of their current permit until a final revised permit is issued. U.S. EPA will not issue a final permit until after the public has a chance to comment.

In January 2013 EPA proposed to reopen a Clean Air Act permit for a hazardous waste combusting facility in southern Illinois. U.S. EPA proposed this permit action for Veolia ES Technical Solutions LLC, 7 Mobile Ave., Sauget, IL, near St. Louis, to modify its Clean Air Act Title V operating permit. The revised permit included "feedrate" limits for certain heavy metals. Feedrate limits are the maximum amount of heavy metals Veolia can feed into the incinerator combustion unit per hour. The heavy metals include mercury, arsenic and lead. The proposed permit also included additional requirements for monitoring the waste incinerated by Veolia at the facility.

U.S. EPA based the proposed feedrate limits, which comply with applicable regulations, on available performance test data. Veolia will continue operating the combustors following the requirements of their current permit until a final revised permit is issued. EPA held a public hearing on February 19, 2013 and accepted comments on the proposed permit reopening until April 1, 2013.

After taking comment on the draft reopening of Veolia's permit, because of the timing of EPA's proposal in relationship to the expiration of Veolia's existing permit and the regulatory requirement for Veolia to perform compliance testing, EPA decided instead to incorporate revisions into Veolia's permit at renewal. EPA will provide a response to the comments received on the permit proposed in January 2013 along with its proposed decision on the renewal application discussed above. The comments received on the draft reopening of Veolia's permit can be viewed online at www.regulations.gov Docket ID No EPA-805-OAR-2012-0649.

Permit Reopening Documents

We need to make the following changes:

Permit Renewal Documents

You will need Adobe Reader to view some of the files on this page. See [EPA's PDF page](#) to learn more.

- [Application for Renewal of Major Source Operating Permit \(PDF\)](#) (114 pp, 2.7 MB) April 2013 →
Explanation: Replace "Kit" with "Permit"
- [Addendum to Application for Renewal of Major Source Operating Permit \(PDF\)](#) (88 pp, 2.8 MB) Aug 2013 →
Explanation: Replace "Kit" with "Permit"
- [Email Clarifications Addendum \(PDF\)](#) (2 pp, 69 K) Nov 2013
- [Certification for revisions to Title V Application for Renewal, August 2013 Addendum \(PDF\)](#) (17 pp, 8 MB) April 2014
- [Email Change in VOM Calculation Methodology for Material Processing Areas \(PDF\)](#) (2 pp, 86K) April 2014
- [Title V Renewal Completeness Determination \(PDF\)](#) (2 pp, 68 K) Sep 2013
- [Forms Appendix A \(PDF\)](#) (109 pp, 2.2 MB) Oct 2013

- [Nonapplicable Regulations Appendix B \(PDF\)](#) (14 pp, 812 K) Sep 2013
- [GHG Emissions \(PDF\)](#) (1 pp, 66K) Dec 2010
- [Most Recent Notification of Compliance \(NOC\) Appendix E \(PDF\)](#) (209 pp, 6.6 MB) Oct 2008 → Explanation: Replace “Complaint” with “Compliance”
- [Startup, Shutdown, and Malfunction Plan Appendix G \(PDF\)](#) (63 pp, 1.2 MB) Oct 2008
- [Title V Items to be Removed Appendix K \(PDF\)](#) (15 pp, 686 K) Oct 2008
- [Feedstream Analysis Plan Appendix J \(PDF\)](#) (10 pp, 229 K) Oct 2008
- [Emergency Safety Vent Operating Plan Appendix I \(PDF\)](#) (17 pp, 229 K) Oct 2008
- [Automatic Waste Feed Cutoff Plan Appendix H \(PDF\)](#) (16 pp, 388 K) Oct 2008 → Explanation: Replace “Weed” with “Waste”
- [Continuous Emissions Monitoring System Quality Assurance Plan Appendix D \(PDF\)](#) (60 pp, 1.2 MB) Oct 2008
- [Construction Permits Appendix F \(PDF\)](#) (27 pp, 1.1 MB) Feb 2001 → Explanation: Replace “Permit” with “Permits”
- [Waste Analysis Plan for Trade Waste Incineration \(PDF\)](#) (82 pp, 3.8 MB) Sept 1994
- [Addendum to Veolia Renewal Application Appendix C Figures](#)

Comprehensive Performance Tests Reports

- [Notification of Compliance \(PDF\)](#) (49 pp, 1.2 MB) Jan 2014
- [Comprehensive Performance Test Report \(PDF\)](#) (128 pp, 3 MB) Jan 2014
- [Appendix I Sampling Equipment/Instrumentation Calibration Documentation \(PDF\)](#) (54 pp, 3.8 MB) Jan 2014
- [Appendix H Data Quality Assessments \(PDF\)](#) (77 pp, 1.1 MB) Jan 2014
- [Appendix B Spiking Report \(PDF\)](#) (160 pp, 13.7 MB) Jan 2014
- [Appendix C Process Operating Data \(PDF\)](#) (445 pp, 2.3 MB) Oct 2013
- [Appendix G Analytical Data Reports \(PDF\)](#) (14,850 pp, 359.6 MB) Oct 2013 Due to its size, this PDF will be available directly from [Andrea Morgan](#) and not available for download from this web site.
- [Appendix F Sampling Documentation \(PDF\)](#) (1,619 pp, 22.3 MB) Oct 2013
- [Appendix E Chains-of-Custody/Field Logbook \(PDF\)](#) (448 pp, 49.5 MB) Oct 2013 Due to its size, this PDF will be available directly from [Andrea Morgan](#) and not available for download from this web site.

• [Appendix D Continuous Monitoring System Performance Evaluation Test Report \(PDF\)](#) (100 pp, 4.8 MB) Oct 2013

• [Appendix A CEMS RATA report \(PDF\)](#) (445 pp, 4.8 MB) Sept 2013

Proposed January 2013 Air Permit Reopening

~~EPA proposes to reopen a Clean Air Act permit for a hazardous waste combusting facility in southern Illinois. U.S. EPA is undertaking this permit action for Veolia ES Technical Solutions LLC., 7 Mobile Ave., Sauget, Ill., near St. Louis, to modify its Clean Air Act Title V operating permit. The revised permit would include “feedrate” limits for certain heavy metals. Feedrate limits are the maximum amount of heavy metals Veolia can feed into the incinerator combustion unit per hour. The heavy metals include mercury, arsenic and lead. The permit also would include additional requirements for monitoring the waste incinerated by Veolia at the facility.~~

~~U.S. EPA has based the proposed feedrate limits, which comply with applicable regulations, on available performance test data. Veolia will continue operating the combustors following the requirements of their current permit until a final revised permit is issued. U.S. EPA will not issue a final permit until after the public has a chance to comment.~~ → Explanation: This language was revised as shown below. See last request.

In January 2013 EPA proposed to reopen a Clean Air Act permit for a hazardous waste combusting facility in southern Illinois. U.S. EPA proposed this permit action for Veolia ES Technical Solutions LLC., 7 Mobile Ave., Sauget, Ill., near St. Louis, to modify its Clean Air Act Title V operating permit. The revised permit included “feedrate” limits for certain heavy metals. Feedrate limits are the maximum amount of heavy metals Veolia can feed into the incinerator combustion unit per hour. The heavy metals include mercury, arsenic and lead. The proposed permit also included additional requirements for monitoring the waste incinerated by Veolia at the facility.

U.S. EPA based the proposed feedrate limits, which comply with applicable regulations, on available performance test data. Veolia will continue operating the combustors following the requirements of their current permit until a final revised permit is issued. EPA held a public hearing on February 19, 2013 and accepted comments on the proposed permit reopening until April 1, 2013.

{Paragraph return} → for clarity/ease of reading.

After taking comment on the draft reopening of Veolia’s permit, because of the timing of EPA’s proposal in relationship to the expiration of Veolia’s existing permit and the regulatory requirement for Veolia to perform compliance testing, EPA decided instead to incorporate revisions into Veolia’s permit at renewal. EPA will provide a response to the comments received on the permit proposed in January 2013 along with its proposed decision on the renewal application discussed above. The comments received on the draft reopening of Veolia’s permit can be viewed online at www.regulations.gov Docket ID No EPA-R05-OAR-2012-0649.

From: Ostermeier, Jennifer **On Behalf Of** R5WebSupport
Sent: Thursday, April 24, 2014 1:27 PM
To: Morgan, Andrea; R5WebSupport
Cc: Ogulei, David
Subject: RE: Changes to Veolia Permit Modification Webpage

I have made these changes. Please refresh your browser, that could be why the pdfs aren’t opening.

From: Morgan, Andrea

Sent: Thursday, April 24, 2014 11:42 AM
To: R5WebSupport
Cc: Ogulei, David
Subject: RE: Changes to Veolia Permit Modification Webpage

Deborah,

The missing document is attached- it should go into the permit renewal documents section. It is also on the L drive.

Additionally the first two paragraphs under "Proposed January 2013 Air Permit Reopening" should be deleted. I cut and paste the webpage into word and tracked changes to show this and the other changes we would like you to prioritize.

We are also still having issues opening the final document in the "Proposed January 2013 Air Permit Reopening". The document I'm referring to is titled "Waste Analysis Plan for Trade Waste Incineration (PDF)". I'm not sure if there is something wrong with the link or if my computer is just having issues.

We think that prioritizing the change of order of the documents under the Permit Renewal Documents Section so that that these 4 are first in the documents list we think that it would be very helpful for visitors to the site. The other order and document name changes can be delayed a bit and I can get you a more detailed list of our suggested name changes and order.

1. Application for Renewal of Major Source Operating Kit
2. Addendum to Application for Renewal of Major Source Operating Kit
3. Email Clarifications Addendum
4. Certification for Revisions to Title V Application for Renewal, August 2013 Addendum

Currently I don't think we have any dates associated with this action that can be easily put on a

calendar or events page- we're wondering if it would be possible to have a link to it under the "Key Issues" section here: <http://www2.epa.gov/aboutepa/epa-region-5>. If not we may just be sending the link to the page out to interested parties.

Thanks again,

Andrea

From: Ostermeier, Jennifer **On Behalf Of** R5WebSupport
Sent: Thursday, April 24, 2014 10:49 AM
To: Morgan, Andrea; R5WebSupport
Cc: Ogulei, David
Subject: RE: Changes to Veolia Permit Modification Webpage

I made the changes with you exception of highlighted documents below. Is there something here that specifically needs to go on our regional news and events page, a calendar item, etc?

From: Morgan, Andrea
Sent: Wednesday, April 23, 2014 10:22 AM
To: R5WebSupport
Cc: Ogulei, David
Subject: RE: Changes to Veolia Permit Modification Webpage

Great thank you! Overall looks great but we do have a few changes we would like to make:

1. Change the Title of the page from "Veolia ES Technical Solutions Air Permit Modification" to "Veolia ES Technical Solutions LLC. Air Permitting Actions"
2. Change the contact information in the box on the right from John Mooney to Andrea Morgan (morgan.andrea@epa.gov 312-353-6058)
3. Change the title of "GHG CFR" (9th document under Permit Renewal Documents) to "GHG Emissions"- we think this title more clearly describes the document
4. Change "Feedseed" to "Feedstream" in the document title of the 13th document in the Permit renewal documents (currently titled "Feedseed Analysis Plan Appendix J)

5. Remove the “Attend a Public Meeting or Tour the Facility Box”. Since that happened last year we think it may be confusing to leave on the page
6. Remove the last sentence in “Proposed January 2013 Air Permit Reopening” section that begins with “ Submit written comments to...” Replace this with “EPA held a public hearing on February 19, 2013 and accepted comments on the proposed reopening until April 1 2013.”
7. The Waste Analysis Plan for Trade Waste Incineration (last document under “Permit Renewal Documents”) did not open on my computer or my coworker’s computer. Could you check that link?
8. Add the link to the document titled “Addendum to Veolia Renewal Application Appendix C Figures” to the Permit Renewal Documents Section. It doesn’t appear to have made it onto the page. I don’t see this PDF. Send to the r5websupport inbox.
9. We think that it may be more clear to have the Appendix documents under the permit renewal section titled like the appendix documents under the comprehensive performance tests reports (ie. titled like Appendix A Application Forms rather than Forms Appendix A). If possible could you change those titles? –Right now, the titles and ordering of these documents are fine. If we have extra time next week, we may be able to change these, send a list of the specific titles to change. If there is something you definitely need toward the top of the list, I can do that.
10. We would like to reorder some of the documents under Permit Renewal Documents to be in an order that would be more likely to reflect the order a reader would approach them. Our suggested order is as follows as follows:
 5. Application for Renewal of Major Source Operating Kit
 6. Addendum to Application for Renewal of Major Source Operating Kit
 7. Email Clarifications Addendum
 8. Certification for Revisions to Title V Application for Renewal, August 2013 Addendum
 9. Appendix A Forms
 10. Appendix B Nonapplicable Regulations
 11. Appendix C Figures
 12. Etc... (appendixes in alphabetical order after the appendix documents we don’t particularly care about the order things are in)
11. Similarly for the documents under the Comprehensive Performance Test Reports can we order it so that the appendixes are in alphabetical order.

Thanks you for all of your work on this. Please let me know if you have any questions or would like to discuss any of our proposed changes. I'm going to be out of the office at an EJ training Thursday afternoon through Friday but if you have any questions during that time frame you can contact David Ogulei (3-0987)

Thanks,

Andrea

From: Lamberty, Deborah **On Behalf Of** R5WebSupport
Sent: Tuesday, April 22, 2014 4:38 PM
To: Morgan, Andrea
Subject: RE: Changes to Veolia Permit Modification Webpage

Done. Fingers are crossed.

From: Lamberty, Deborah **On Behalf Of** R5WebSupport
Sent: Tuesday, April 22, 2014 3:41 PM
To: Morgan, Andrea
Subject: RE: Changes to Veolia Permit Modification Webpage

Great. Thanks. I will let you know when these go up.

From: Morgan, Andrea
Sent: Tuesday, April 22, 2014 2:56 PM
To: R5WebSupport
Subject: RE: Changes to Veolia Permit Modification Webpage

Deborah,

I could process those requests and email them to people as necessary.

Thanks,

Andrea

From: Lamberty, Deborah **On Behalf Of** R5WebSupport
Sent: Tuesday, April 22, 2014 2:55 PM
To: Morgan, Andrea
Subject: RE: Changes to Veolia Permit Modification Webpage

Hi Andrea,

Finally I am ready to upload. So many technical difficulties...

There are two large PDFs which we don't post for various reasons. Instead, we offer to send these via CD/compressed file or whatever means you would like to use. I will need a contact who would process these request and their contact information. Please advise.

Deborah

Deborah Lamberty
Public Affairs Specialist | [USEPA Career Coach](#)
US Environmental Protection Agency
Region 5 | Office of External Communications

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lamberty.deborah@epa.gov

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From: Morgan, Andrea
Sent: Tuesday, April 15, 2014 9:15 AM
To: R5WebSupport
Subject: RE: Changes to Veolia Permit Modification Webpage

Ok I think the documents have been unlocked and you should have rights to edit and rename them. Please let me know if you are still having problems.

Thanks!

Andrea

From: Lamberty, Deborah **On Behalf Of** R5WebSupport
Sent: Monday, April 14, 2014 3:10 PM
To: Morgan, Andrea
Subject: RE: Changes to Veolia Permit Modification Webpage

Hi again,

We have file naming conventions and I am unable to rename your PDFs. I am not sure how you have saved them, but you will have to "unlock" them. Let me know if you have any questions.

Thanks,

Deb

From: Morgan, Andrea
Sent: Thursday, April 10, 2014 2:56 PM
To: R5WebSupport
Subject: RE: Changes to Veolia Permit Modification Webpage

Thanks,

We would like all the documents in the folder titled, "Documents for Veolia Webpage" (including the documents in the 2013 CPT Report subfolder) to be added to the webpage

L:\ARD\Veolia\Veolia Part 71 Permit\Documents for Veolia webpage

Please let me know if you have any questions.

From: Lamberty, Deborah **On Behalf Of** R5WebSupport
Sent: Thursday, April 10, 2014 2:12 PM
To: Morgan, Andrea
Subject: RE: Changes to Veolia Permit Modification Webpage

Hi,

Large documents (PDFs) are to be put in L: drive.

Thanks.

From: Morgan, Andrea
Sent: Wednesday, April 09, 2014 4:53 PM
To: R5WebSupport
Cc: Ogulei, David; Damico, Genevieve
Subject: Changes to Veolia Permit Modification Webpage

Hello,

We would like to make some revisions to the Veolia Air Permit Modification webpage (<http://www.epa.gov/region5/air/veoliasauget/index.html>)

Attached is a word document explaining the changes we would like to make to the body of webpage. We also have a number of documents we would like to post to the page, several of which are quite large. Is emailing them the best method to transfer them to you or is there a different method you would prefer?

Please let me know if you have any questions

Thanks,

Andrea

Andrea Morgan

Environmental Engineer

U.S. Environmental Protection Agency

Region 5 | Air & Radiation Division

Phone: (312) 353-6058 | Fax: (312) 692-2920

